



March 14, 2024

TRANSMITTED VIA EMAIL

Shadie Bisharat

Working Group Chair for ASTM WK76767 Computer Vision Based Drowning Detection Systems for Residential Swimming Pools

ASTM International

100 Barr Harbor Dr.

West Conshohocken, PA 19428-2959

Dear Mr. Bisharat,

Staff of the U.S. Consumer Product Safety Commission¹ (CPSC) appreciates the efforts of the ASTM Subcommittee F15.49 on Pool Safety Standards to develop a new voluntary standard for swimming pool monitoring via work item WK76767, Computer Vision Based Drowning Detection Systems for Residential Swimming Pools, in ballot F15.60 (24-03), Item No. 2.

The ASTM WK76767 draft standard was previously balloted in F15.49 (23-01) with a closing date of November 27, 2023. Two negative ballot votes strongly expressed safety concerns with the draft standard for pool drowning monitoring and detection. Those negative ballots were voted persuasive, and the current ballot, F15.60 (24-03), Item No. 2, incorporates changes intended to address those negative votes; however, CPSC staff is concerned that these issues, among others, have not adequately been addressed in the ballot response. This CPSC staff letter is intended, in part, to highlight and support the importance of those negative ballots.

- One negative ballot states that the ASTM WK76767 draft standard would address limited drowning scenarios and that the monitoring device limitations should be printed on the exterior of the product box and in instructions to notify consumers of limitations prior to product purchase. In particular, the draft standard contained a pool detection scenario where the victim could reach the pool bottom surface before activation of the device. Staff strongly advocates for the standard to require alertment prior to the victim reaching the bottom of the pool, as fatalities can occur before that stage. Staff is concerned that, as written, detection system limitations would delay rescue and increase the likelihood for a child drowning fatality.

¹ The views or opinions expressed in this letter are solely those of the staff and may not represent those of the Commission.



- A second negative ballot requested removal of the term ‘safety’ throughout the standard, including the title of ASTM WK76767 draft standard, as the device is primarily a monitoring device and safety terminology would create a false sense of security compared to the devices’ actual performance. Staff is concerned with removal of the term safety, as the intent of this standard is to enhance pool safety for children.

Staff strongly recommends that pool monitoring devices intended to be within the scope of ASTM WK76767 meet the safety requirements in the ASTM F2208 *Standard Safety Specification for Residential Pool Alarms*. Staff notes that at least one drowning detection manufacturer has aligned and marketed their product to the voluntary standard, ASTM F2208.

CPSC staff looks forward to continuing work with the subcommittee to address drowning hazards.

Sincerely,

Susan Bathalon

Susan Bathalon

M.S., Mechanical Engineering

Children’s Program Risk Manager

Directorate for Hazard Identification and Reduction

CC: Molly Lynyak, ASTM F15 Staff Manager

Jacqueline Campbell, CPSC Voluntary Standards Coordinator

Merle Stoner, ASTM F15.49 Pool Safety Subcommittee Chair